Loureiro
Engineering • Construction • EH&S • Energy
Waste • Facility Services • Laboratory

August 26, 2016

United States Environmental Protection Agency
Region 1
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912

Attn: Kimberly N. Tisa, PCB Coordinator

RE: Response to EPA Comments Dated August 16, 2016
PCB Remedial Action Work Plan for Approval under 40 CFR 761.61(c)
Former Building 270 Release Area
Pratt & Whitney Facility - Middletown, Connecticut
Loureiro Commission Number: 88UT245.002

Dear Ms. Tisa:

On behalf of United Technologies Corporation (UTC), Loureiro Engineering Associates, Inc. (Loureiro) has prepared this letter in response to comments received from the Environmental Protection Agency (EPA) Region 1 on the above-referenced Remedial Action Work Plan (RAWP). The EPA comments documented in this letter, in italicized text, were received in an email dated August 16, 2016. Please consider this response letter as an addendum to the RAWP. The following are responses to each EPA comment.

RESPONSE TO EPA COMMENTS

1. *Page 9. Response 4, last paragraph. It is stated that PCB-contaminated soil located in the top 2 feet in the EC area exhibiting PCB concentrations between 10 to less than (<) 50 ppm will be disposed in accordance with 40 CFR § 761.61(a)(5)(v)(A). Based on the latest data, soil within the top 2-feet also appears to contain PCB concentrations between1 and 10 ppm. How will that soil be managed if excavated?*

Response: The materials that will be excavated for installation of the Former Building 270 Connecticut Department of Energy and Environmental Protection (CTDEEP) approved Engineered Control (EC) (upper two feet of soil) exhibiting polychlorinated biphenyl (PCB) concentrations greater than or equal to 1 part per million (ppm) but less than 50 ppm will be disposed of in accordance with Title 40 of the Code of Federal Regulations (CFR) Part 761.61(a)(5)(v)(A).

2. *Page 10. Response 6.*
    a. *The proposed risk-based plan now appears to include the northern portion of the former building 270. Please confirm. Also, please provide a copy of CTDEEP's*

approval for the EC as shown on Drawing 3-4. Was public notice/comment required and if so were any comments received?

Response: Correct, the proposed risk-based plan was modified to include the northern portion of the former Building 270. Given that PCBs have been identified at concentrations near 50 mg/kg in this area and the uncertainty of the source of the fill material used to backfill the former Building 270 basement and sub-basement areas, the remediation plan has been revised to address all of the PCBs identified at concentrations ≥1 mg/kg as a PCB Remediation Waste in accordance with a Risk-Based Disposal Approval under Title 40 of the Code of Federal Regulations (CFR) § 761.61(c).

A copy of the CTDEEP approval is attached.

A public notice was required and completed to support the use of a CTDEEP-approved EC. A copy of the public notice package provided to the CTDEEP in support of the EC is attached. The CTDEEP did not receive any public comments on the proposed EC.

b. Given the most recent data, PCB concentrations greater than (>) 10 ppm are located at 43 ppm at 8-10 feet below grade (B220-SB-534). Is CTDEEP amenable to leaving PCB concentrations > 10 ppm in-place beneath the EC?

Response: Yes, the CTDEEP is aware of the PCB concentrations present and is amenable to leaving PCB concentrations greater than 10 ppm in-place beneath the EC.

3. Page 11. Response 7, Table. It is unclear what this table is meant to convey. The first column is entitled Depth (feet); however, the entries are the extraction methods. In addition, EPA does not understand the value of the geometric mean (i.e., what different data were used in the calculation to determine the mean). For example, if samples were collected at various depths and then averaged, EPA is not clear as to what value this is. Please review the table and edit, as necessary for clarity.

Response: The table was meant to convey information regarding the distribution of the data using the different extraction methods and included all of the samples (regardless of location or depth) analyzed following each extraction method. The column header should have been identified as Extraction Method. The inclusion of the geometric mean on the table was as another statistic that provides information regarding the distribution of the data. A corrected table is provided below.

Extraction Method	Detection Frequency	Detected Concentration (mg/kg)				
		Minimum	Maximum	Median	Average	Geometric Mean
Soxhlet	96 / 160	0.0353	42.9	0.174	1.02	0.218
ME	40 / 103	0.103	48.18	0.492	3.09	0.773
PFE	3 / 17	0.153	0.259	0.202	0.205	0.200

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4. Page 11. Response 7. There is discussion of the comparison of the 2 extraction methods (i.e., 3540 vs. 3546). While Figure 3 was provided to reflect how well the methods compare, as presented the information is confusing. What would be helpful is a table showing the soxhlet vs. microwave analytical results. The information should also include the sample identifier, location, and depth.

Response: The Soxhlet and microwave extraction analytical results were included on Table 3-2A. To facilitate your review, we have compiled the results for only those samples where both Soxhlet and microwave extractions were performed into a separate table (see Table 1, attached).

5. In the text it is not clear how the "subset" of 10 samples was collected for microwave extraction (ME). It is unclear if these samples were collected individually in the field, if the ME sample and soxhlet samples were aliquoted from the same sample, or if some other method was used. Please clarify.

Response: Other than the locations where a field duplicate was collected, a single sample jar was collected in the field from each location and depth interval and the Soxhlet and ME samples were aliquoted from that single sample jar. The samples to be analyzed following ME were selected based on the Soxhlet results to provide comparative results over a range of PCB concentrations.

Thank you for your assistance with the above-referenced project. If you have any questions or require further information, please contact me at 860-747-6181.

Sincerely,

LOUREIRO ENGINEERING ASSOCIATES, INC.

John K Bogdanski, P.G., L.E.P.
Senior Project Manager

Attachments

Attachment 1	Engineered Control Variance Request Approval
Attachment 2	Public Notice Package
Table	Comparison of Soxhlet Extraction and Microwave Extraction PCB Analytical Results

cc: Katherine Woodward, EPA
Gary Trombly, DEEP
Jing Chen, DEEP
Joseph Tota, UTC

Attachments

Attachment 1
Engineered Control Variance Request Approval

Connecticut Department of
ENERGY &
ENVIRONMENTAL
PROTECTION

79 Elm Street • Hartford, CT 06106-5127 www.ct.gov/deep Affirmative Action/Equal Opportunity Employer

October 22, 2014

CONDITIONAL APPROVAL

United Technologies Corporation /Pratt & Whitney Division
400 Main Street
East Hartford, CT 06118

Attention: Renee L. Welsh

RE: Engineered Control Variance Request
United Technologies Corporation (UTC) / Pratt & Whitney Division
Aircraft Road, Middletown
Remediation ID No. **7442**
EPA I.D. No. CTD003935905

Dear Ms. Welsh:

The Remediation Division of the Bureau of Water Protection and Land Reuse (the Department) has reviewed a variance request application consisting of documents titled "Application for Engineered Control Variance, Part 1 and Part 2" dated March 2014, updated in September 2014 (EC Application) and "Addendum to EC Application" dated October 9, 2014 via an electronic mail for the above-referenced property. The variance request was prepared by Loureiro Engineering Associates, Inc. (Loureiro) on behalf of UTC, in conjunction with a request for the Commissioner to approve a variance under Section 22a-133k-2(f)(2) of the Remediation Standard Regulations (RSRs) of the Regulations of Connecticut State Agencies (RCSA).

The variance request proposes the use of seven (7) engineered controls (ECs) on the property to physically isolate soils and/or to minimize migration of liquids through soils polluted with various metals, SVOCs, PCBs, ETPH, and VOCs at concentrations exceeding the Industrial/Commercial Direct Exposure Criteria (IDEC) / Residential Direct Exposure Criteria (RDEC) and/or Pollutant Mobility Criteria (PMC); each EC is described below:

1. ECM Permitted Landfill (ECM-PRA-4): The proposed EC will recap the landfill and extend the cap over the newly discovered waste. The proposed EC cap consists of a Geo-synthetic Clay Liner (GCL), a minimum of 18 inches of backfill, and six (6) inches of seeded topsoil to achieve a permeability of 1x 10^{-6} centimeter per second (cm/s). Since this is considered a non-hazardous, solid waste landfill consisting of industrial waste, the cap is suitable for rendering all materials under the cap inaccessible and

environmentally isolated. Loureiro also proposes to further delineate the waste in order to define the actual size of the EC cap prior to the implementation of the EC.

2. SWMU 6 (410-PRA-1) - former unpermitted solid waste disposal area: The proposed EC consists of 18 inches of cover material and six (6) inches of seeded topsoil to physically isolate the soils polluted with SVOCs at concentrations exceeding the IDEC/RDEC.
3. SWMU 14 (410 PRA-2/Fill Area 410-PRA-13) - former unpermitted solid waste disposal area: The area is also proposed to be used to dispose of approximately 17,000 cubic yards of contaminated soil that will be excavated from other areas within the site. The proposed EC consists of a 40-millimeter thick High Density Poly-ethylene (HDPE) liner overlain by 18 inches of clean fill and six (6) inches of seeded topsoil to achieve permeability of 1x 10^{-6} centimeter per second (cm/s) in order to physically isolate the soils and to minimize migration of liquids through the soils polluted with SVOCs, ETPH, VOCs, metals, and PCBs at concentrations that exceed IDEC/RDEC and GBPMC.
4. Former Building 260 (B220-PRA-39) – landscaped area: The proposed EC consists of a 40-millimeter thick High Density Poly-ethylene (HDPE) liner overlain by 18 inches of clean fill and six (6) inches of seeded topsoil to achieve permeability of 1x 10^{-6} centimeter per second (cm/s) in order to physically isolate the soils and to minimize migration of liquids through the soils polluted with SVOCs and ETPH at concentrations that exceed IDEC/RDEC and GBPMC.
5. Former Building 270 (B220-PRA-40) – mixed landscaped and paved area: The proposed EC consists of a 40-millimeter thick HDPE liner overlain by 18 inches of clean fill and six (6) inches of seeded topsoil in the landscaping area and overlain by 12 inches of process gravel and 3 inches of bituminous pavement in the paved area in order to physically isolate the soils and to minimize migration of liquids through the soils polluted with SVOCs, ETPH, and 1,2,4-trichlorobenzene at concentrations exceed IDEC/RDEC and GBPMC.
6. Building 410 (410-PRA-25) - mixed landscaped and paved area: For the area that is currently paved, the proposed EC uses the existing pavement as a physical barrier to prevent direct contact with underlying contaminated soil. For the area that is currently grassed, it will be either excavated down to 12 inches and then paved with 3 inches of bituminous pavement over 9 inches of processed gravel, or excavated to 2 feet and then backfilled with clean fill with seeded top cover. A colored warning marker/barrier is required in the area to be excavated as a condition of this approval.
7. Building 220 (220-PRA-42A) - mixed landscaped and paved area: The proposed EC is similar to the EC for Building 410 (410-PRA-25).

The above-referenced variance request is hereby approved with the following conditions:

1. A colored warning marker/barrier is required in Building 410 (410-PRA-25) and Building 220 (220-PRA-42A) for the areas to be excavated before the installation of the EC cap.

2. The groundwater monitoring program should be conducted on a semi-annual schedule following the implementation of the ECs. The groundwater monitoring program can be modified once the data supports the annual monitoring schedule.
3. The proposed engineered control must be implemented/installed consistent with the schedule in the Part 2 Application, or on a schedule agreed to by the Commissioner. The implementation/installation of the engineered control includes completing construction of the engineered control and having the required financial assurance posted and in effect within one year of the installation of this engineered control, with an originally-signed financial assurance instrument having been submitted to the Department.
4. The Department must be notified when installation of the approved engineered control has been completed.
5. The recording of an Environmental Land Use Restriction on the land records, which includes an "as-built" plan and language referencing the approved maintenance and monitoring plan is also required within one year of the installation of this engineered control or on a schedule agreed to by the Commissioner.
6. An annual report documenting the status of the engineered control including all inspection, maintenance, repair, financial assurance and/or monitoring requirements listed in the variance request must be submitted to the Department by January 30 of each year following installation of the approved engineered control.
7. An access agreement shall be retained for any work conducted on the neighboring properties.
8. All applicable local, state, and federal permits are obtained prior to constructing the engineered control.

The Department's approval of the engineered control as a long-term remedial approach is contingent upon the conditions of this approval being maintained. If the Environmental Land Use Restriction is not filed on the land records, if the engineered control is found to have failed and is not restored in a timely manner, or if financial assurance is not being maintained, the property would no longer be in compliance with the RSRs.

Nothing in this approval shall affect the Commissioner's authority to institute any proceeding, or take any action to prevent or abate pollution, to recover costs and natural resource damages, and to impose penalties for violations of law. If at any time the Commissioner determines that the approved actions have not fully characterized the extent and degree of pollution or have not successfully abated or prevented pollution, the Commissioner may institute any proceeding, or take any action to require further investigation or further action to prevent or abate pollution. This approval relates only to the pollution or contamination identified in the above referenced variance request.

No provision of this approval and no action or inaction by the Commissioner shall be construed to constitute an assurance by the Commissioner that the actions taken pursuant to this approval will result in compliance or prevent or abate pollution.

In addition, nothing in this approval shall relieve any person of his or her obligations under applicable federal, state and local law.

If you have any questions pertaining to this matter, please contact Jing Chen of my staff at (860) 424-3391.

Sincerely,

Patrick F. Bowe
Director
Remediation Division
Bureau of Water Protection and Land Reuse

PFB:JC

c: David Fiereck, Loureiro Engineering Associates, Inc., 100 Northwest Drive, Plainville, CT 06062
Joe Tota, United Technologies Corporation, 9 Farm Springs Road, M/S 9FS-101, Farmington, CT 06032
Maurice Hamel, DEEP

Sent Certified Mail

Attachment 2
Public Notice Package

Bureau of Water Protection and Land Reuse
Remediation Division

Date Stamp
(DEP Use Only)

Approval Request or Notice Transmittal Form

In accordance with RCSA Sections 22a-133k-1 through k-3 (RSRs)

Please complete this transmittal form to submit a request for the commissioner's approval or to provide notice to the commissioner, as required pursuant to the Remediation Standards Regulations, Sections 22a-133k-1 through k-3 (RSRs) of the Regulations of Connecticut State Agencies. Attach all information required by the applicable paragraph(s) in the RSRs for each type of request or notice to this transmittal form.

All sections of this form must be filled out, as applicable.

Groundwater Classification: **GA and GB**

Remediation ID No. (Rem#): **7442**

Site Identification

Site Name: **Pratt & Whitney**

Site Address: **Aircraft Road**

City/Town: **Middletown** State: **CT** Zip Code: **06457**

Printed Name of LEP: **David Fiereck** Phone: **860-747-6181**

Printed Name of Certifying Party or Property Owner (as appropriate):

United Technologies Corporation Phone: **860-728-6610**

Name of DEP Case Manager: **Jing Chen**

Document Information (list document which contains request(s) or notice(s))

DOCUMENT	DATED	PREPARED BY
PUBLIC NOTICE DOCUMENT	2/21/2014	Loureiro Engineering
NUMBER OF APPROVALS REQUESTED: 0	PAGE/SECTION IN DOCUMENT:	
NUMBER OF NOTICES INCLUDED: 1	PAGE/SECTION IN DOCUMENT: 3	

Program Information (check the appropriate box)

☐ TRANSFER ACT (PURSUANT TO CGS SECTION 22A-134A)

☐ DEP ENFORCEMENT / ORDER

☐ VOLUNTARY REMEDIATION (PURSUANT TO CGS SECTION 22A-133X OR 22A-133Y)

☒ OTHER (SPECIFY): 22A-4499(C)-105H

Submit this completed form and supporting documents to:

REMEDIATION DIVISION, 2ND FLOOR,
BUREAU OF WATER PROTECTION AND LAND REUSE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
79 ELM STREET, HARTFORD, CT 06106 - 5127

Approval Request or Notice Form (continued)

Rem#: **7442**

Approvals Requested with this Transmittal

Check each box that applies to the approval(s) requested with this transmittal.

Approvals Required by the Remediation Standard Regulations (RSR)	RSR Section References
☐ Alternative Direct Exposure Criteria	*22a-133k-2(d)(1) & (2)*
☐ Alternative Direct Exposure Criteria for PCBs	*22a-133k-2(d)(1) & (7)*
☐ Alternative Pollutant Mobility Criteria	*22a-133k-2(d)(1) & (3) or (5)*
☐ Alternative Pollutant Mobility Dilution/Dilution Attenuation Factor	*22a-133k-2(d)(1) & (4) or (6)*
☐ Alternative Surface Water Protection Criteria	*22a-133k-3(b)(3)(B)*
☐ Alternative Volatilization Criteria	*22a-133k-3(c)(4)(B)*
☐ Additional Direct Exposure Criteria	*22a-133k-2(b)(4)(A)*
☐ Additional Pollutant Mobility Criteria	*22a-133k-2(c)(5)*
☐ Additional Groundwater Protection Criteria	*22a-133k-3(h)(1)*
☐ Alternative Analytical Method	*22a-133k-2(e)(3)(A)(i) & 3(f)(4)(A)(i)*
☐ Widespread Polluted Fill Variance	*22a-133k-2(f)(1)*
☐ Use of Engineered Control	*22a-133k-2(f)(2)(B)*
☐ Reuse of Polluted Soil	*22a-133k-2(h)(3)*
☐ Indoor Air Monitoring Plan	*22a-133k-3(c)(5)(B)(i)*
☐ Exemption from Volatilization Criteria by demonstrating no building can be constructed	*22a-133k-3(c)(5)(A)*
☐ Variance Due to GW Technical Impracticability	*22a-133k-3(e)(2)*
☐ Alternative Groundwater Monitoring Plan	*22a-133k-3(g)(3)*
☐ Environmental Land Use Restriction (ELUR)	*22a-133q-1*
☐ Other (Specify):	

Notices Submitted with this Transmittal

Check each box that applies to the notice(s) submitted with this transmittal.

Notices Required by the RSR	*RSR Section References*
☐ Polluted Soil Reuse On-site	*22a-133k-2(h)(3)*
☐ Use of Background Concentration in Soil	*22a-133k-2(a)(2)*
☐ Site Specific Dilution in GB Area	*22a-133k-2(c)(2)(E)(iii)*
☐ Volatilization Criteria	*22a-133k-3(c)(3)(B)*
☒ Verify Public Notice of Use of Engineered Control	*22a-133k-2(f)(2)(A)(iv)*
☐ Measures to Prevent Migration of Vapor into Overlying Building	*22a-133k-3(c)(3)(B)(iii)*
☐ Certifications of Notifications of a GW Remediation Variance	*22a-133k-3(e)(2)(C)*
☐ Soil VOC TCLP/SPLP Results to Comply with PMC in GA Areas	*22a-133k-2(c)(2)(B)(ii)(cc) or (iii)(bb)*
☐ Use of Upgradient Groundwater Policy*	**Notice requested, not required*
☐ Exemption for Groundwater Background Due to Technical Impracticability*	**Notice requested, not required*
☒ Other (Specify): **RAP submittal and intent to perform remediation**	

Bureau of Water Protection and Land Reuse
Remediation Division

Date Stamp (DEP Use Only)

Verification of Public Notice
Application for Engineered Control Variance
In accordance with section 22a-133k-2(f)(2)(iv) RCSA

Public notice of a proposed Engineered Control, as specified under section 22a-133k-2(f)(2)(A)(iv) of the RCSA, requires the owner of the subject parcel shall verify to the commissioner in writing on a form furnished by the commissioner that notice has been given in accordance with that subsection. The notices shall direct questions to a representative of the Applicant and formal public comments to the Remediation Division. Please complete this form to fulfill this requirement. *Attach all information required by the applicable sections of this form.*

All sections of this form must be filled out, as applicable.

Remediation ID No. (Rem#): **7442**

Site Identification

Site Name: **Pratt & Whitney**

Site Address: **Aircraft Road**

City/Town: **Middletown** State: **CT** Zip Code: **06457**

Printed name of LEP: **David Fiereck** Phone: **860-747-6181**

Printed Name of Certifying Party or Property Owner (as appropriate):

United Technologies Corporation

Name of DEP Case Manager: **Jing Chen**

Public Notice

Identify the type of notice provided for the proposed engineered control by checking the applicable boxes (2 of 3 are required) and completing the appropriate sections.

Also attach a log of all public inquiries and comments that were received within 30 days after the dates which each form of notice was implemented, including the date and contact information for all comments received. Also attach a draft response to those comments for DEP consideration.

☒ **Publication in a Newspaper**

Date Published: **12/23/2013**

Name of newspaper: **The Middletown Press**

Attach certified copy of published notice

☒ **Posting a Sign (for at least thirty (30) days)**

List dates of sign posting: **January 20, 2014 to February 19, 2014**

1. *Attach photo of sign from street.*
2. *Attach copy of text for sign.*

☐ **Mailing to Abutting Property Owners**

Note that where the abutting property is a corridor for a road, railroad or utility, the properties beyond that corridor must also be included in the notification.

1. *Attach copy of language sent in mailing.*
2. *Attach list of properties and contact information for owners of record.*

Property Owner/Party Certification

"I verify that the information in this submission and supporting documentation is accurate and true."

L. Renee Welsh	**Director of Facilities**
Printed Name of Authorized Representative of Property Owner / Certifying Party	Title
Authorized Signature	Date

Company: **Pratt & Whitney**

Address: **400 Main Street**

City/Town: **East Hartford** State: **CT** Zip Code: **06118**

Phone: **860-565-7396**

Please submit this completed form and supporting documents to:

REMEDIATION DIVISION, 2ND FLOOR,
BUREAU OF WATER PROTECTION AND LAND REUSE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
79 ELM STREET
HARTFORD, CT 06106-5127

ATTACHMENT 1

Publication of Public Notice in a Newspaper

Notice of Proposed Remediation and Use of Engineered Control

United Technologies Corporation, Pratt & Whitney Division (UTC) hereby provides notice pursuant to Section 22a-449(c)-105(h) and Section 22a-133k-1 et seq. of the Regulations of Connecticut State Agencies that it intends to undertake actions to remediate soil and groundwater contamination at its facility located at Aircraft Road in Middletown, Connecticut. The remedial action plan was developed based on assessment of the environmental conditions at the facility. The assessment identified areas of soil and groundwater beneath the Site that are contaminated with one or more of the following types of substances: volatile organic compounds, semi-volatile organic compounds, petroleum hydrocarbons, polychlorinated biphenyls, and metals. The actions that are proposed to be taken to remediate the identified contamination include excavation, off-site disposal of contaminated soil, consolidation of contaminated soil under an engineered control, soil vapor extraction or mitigation of volatile organic compounds, and recording of environmental land use restrictions. While most of the groundwater on the Site does not require remediation, one area of volatile organic contamination in groundwater will undergo monitored natural attenuation. The engineered controls that are proposed for the site will encapsulate contaminated soil beneath one of three types of caps: a low permeability soil cap, an asphalt cap, or a cap constructed with a low permeability plastic liner. The remedial actions will begin in 2014 and will be completed by 2018. Interested persons may obtain additional information about the assessments, the remedial action plan and the proposed engineered controls for the facility by contacting:

United Technologies Corporation
Pratt & Whitney Division
400 Main Street, East Hartford, CT 06108
Attn: Heather Summerer, Manager, Public Relations and Community Relations
(860) 565-0557

Written comments may be directed within 45 days of this notice to:

Department of Energy and Environmental Protection
Remediation Division
79 Elm St., Hartford, CT 06106-5127
Attn: Jing Chen
(860) 424-3705

The Commissioner of Energy and Environmental Protection will hold a hearing on this matter if he receives a petition signed by 25 or more people.

NEW HAVEN REGISTER THE REGISTER CITIZEN The Middletown Press Farmington Valley Times CONNECTICUT
SHORELINE TIMES The Foothills Trader WEST HARTFORD NEWS MINUTEMAN Connecticut Bride
Milford-Orange Bulletin THE GRANBY NEWS the Dolphin THE LITCHFIELD COUNTY TIMES Post-Chronicle

RECEIPT

The Middletown Press
386 Main St. 4th Floor
Middletown, CT 06457
Phone: **1-860-347-3331**

01/20/14

Account:	**363125**
Name:	**ROBIN McKinney Staszak,**
Company:	**Loureiro Engineering Associates, In**
Address:	**Robin McKinney Staszak, PLAINVILLE, CT 06062**
Telephone:	**(860) 747-6181**
Description:	**Notice of Proposed Remediation**

Gross:	**$172.18**
Paid Amount:	**- $172.18**
Amount Due:	**$0.00**

Date:	**01/20/14**
Ad Date:	**12/23/13**
Class:	**1201**
Ad ID:	**195746**
Ad Taker:	**CRSSPENCER**
Sales Person:	**Sam Spencer-Class Rep**
Words:	**339**
Lines:	**64**
Agate Lines:	**150**
Column width:	**2**
Depth:	**8.25**
Inserts:	**2**
Blind Box:	

Publication

Middletown Press, middletown-press.com

Ad sample

Notice of Proposed Remediation and Use of Engineered Control

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United Technologies Corporation
Pratt & Whitney Division
400 Main Street, East Hartford, CT 06108
Attn: Heather Summerer, Manager,
Public Relations and Community Relations
(860) 565-0557

Written comments may be directed within 45 days of this notice to:

Department of Energy and Environmental Protection
Remediation Division
79 Elm St., Hartford, CT 06106-5127
Attn: Jing Chen
(860) 424-3705

The Commissioner of Energy and Environmental Protection will hold a hearing on this matter if he receives a petition signed by 25 or more people.

AD # 195746 - 12/23

We Appreciate Your Business!
Thank You ROBIN McKinney Staszak,!

21ST CENTURY media

AFFIDAVIT OF PUBLICATION

State of Connecticut/ss. Middletown, Counties of Middlesex, Hartford & New Haven

I, C.A. "SAM" Spencer, do solemnly swear, I am a Display / Classified Advertising Executive of The Middletown Press, The New Haven Register, The Register Citizen, West Hartford News, published and printed in Hartford, CT and other areas of CT., in the State of Connecticut, and from my own personal knowledge and reference to the file of said publication the advertisement of Legal Notice, was inserted in the edition requested on the date(s) as follows:

December 22, 2013

Subscribed and sworn to before me this 22nd day of DECEMBER 2013

C.A. "SAM" Spencer, Advertising Executive

Notary Public

My Commission Expires 10/31/2017

AD # 195746 LOUREIRO ENGINEERING ASSOC. – 1200 – pratt & whitney

Media Executive: Sam

Phone: 860 - 347 - 3331 ext. 131
Fax: 860 - 347 - 3380 Attn: SAM
Email: sam@middletownpress.com

Our address is...

386 Main Street, 4th Floor, Main Street Market, Middletown, CT 06457

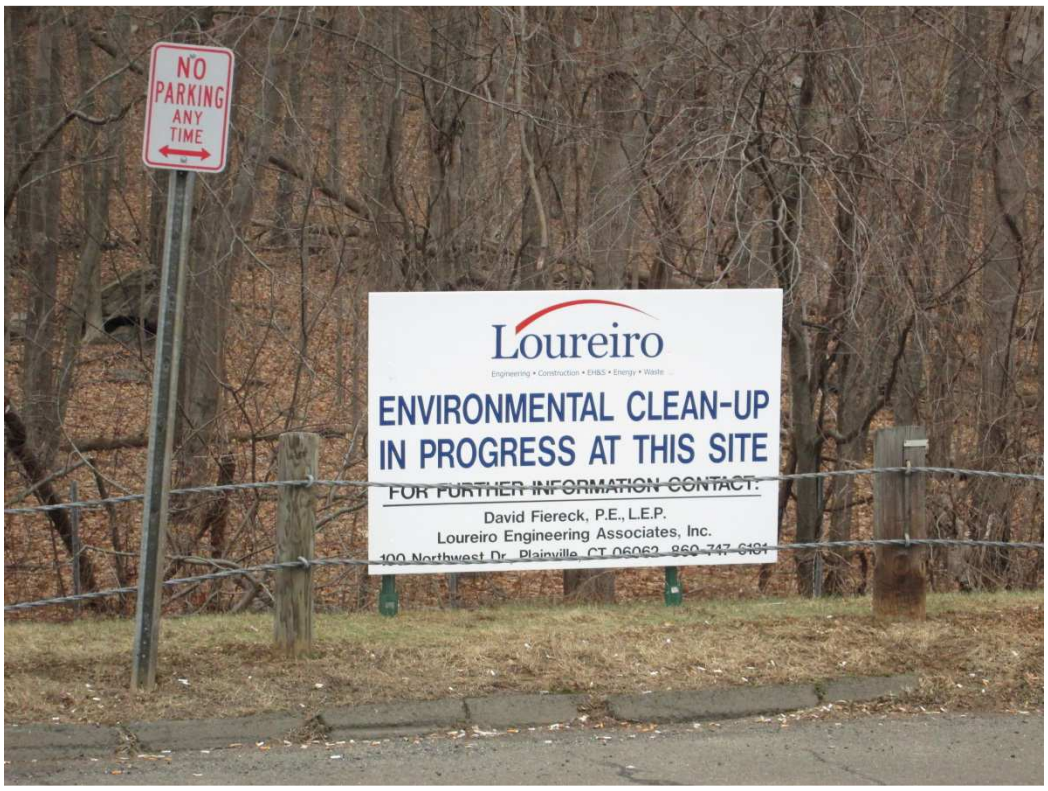
Please mail payments to the address below...

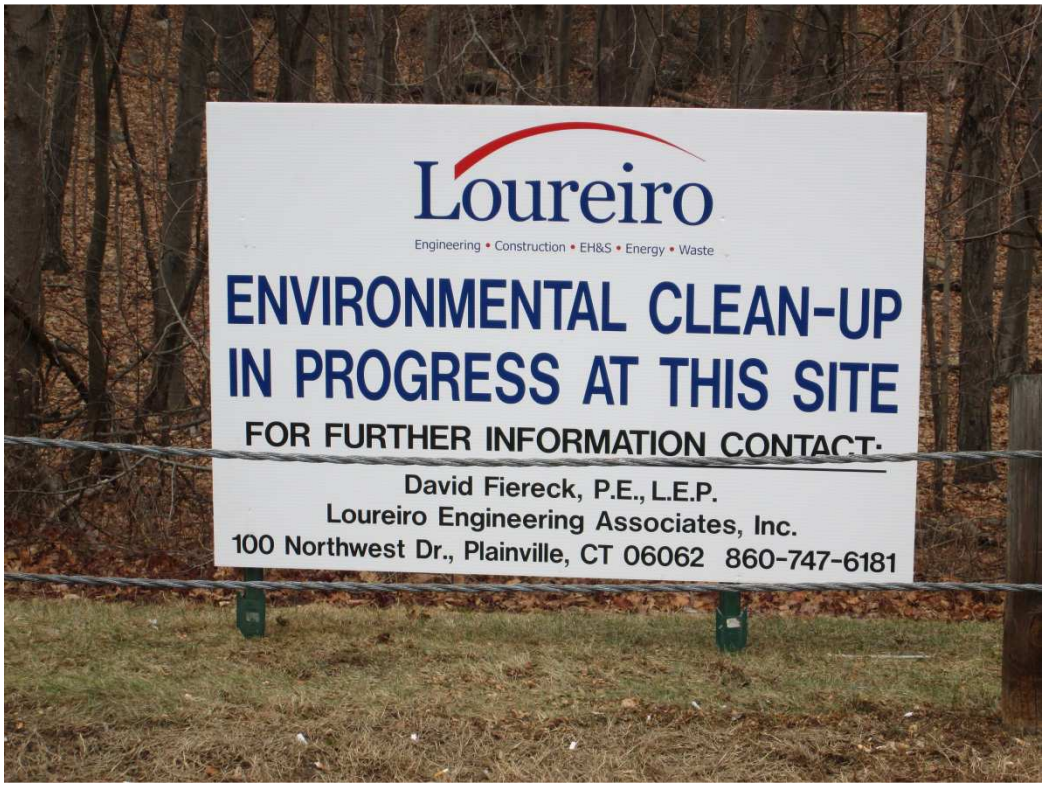
The Middletown Press, Advertising, PO Box 1877, Albany, NY 12201-1877
****** Please include your account number, ad number &/or phone number on the check.***

Thank you for advertising with The Middletown Press & West Hartford News.
It is a pleasure and a privilege to handle your advertising needs;
I look forward to working with you in the future.

ATTACHMENT 2

Pictures and Text of Posted Sign


NO PARKING ANY TIME
Loureiro
Engineering • Construction • EH&S • Energy • Waste
ENVIRONMENTAL CLEAN-UP
IN PROGRESS AT THIS SITE
FOR FURTHER INFORMATION CONTACT:
David Fiereck, P.E., L.E.P.
Loureiro Engineering Associates, Inc.
100 Northwest Dr., Plainville, CT 06062 860-747-6181


Loureiro
Engineering • Construction • EH&S • Energy • Waste
ENVIRONMENTAL CLEAN-UP
IN PROGRESS AT THIS SITE
FOR FURTHER INFORMATION CONTACT:
David Fiereck, P.E., L.E.P.
Loureiro Engineering Associates, Inc.
100 Northwest Dr., Plainville, CT 06062 860-747-6181

ENVIRONMENTAL CLEAN-UP IN PROGRESS AT THIS SITE.
FOR FURTHER INFORMATION CONTACT:

DAVID FIERECK, P.E., L.E.P.

Loureiro Engineering Associates, Inc.
100 Northwest Drive, Plainville, CT 06062 860-747-6181

ATTACHMENT 3

Letter to Middletown Health Department
Director of Public Health

Loureiro

Engineering • Construction • EH&S • Energy • Waste

December 23, 2013

Joe Havlicek, MD
245 deKoven Drive
Middletown, Connecticut 06457

Re: **Notice of Proposed Remediation and Use of Engineered Control**
Pratt & Whitney Middletown Facility
100 Aircraft Road, Middletown, CT.

Dear Dr. Havlicek,

This letter serves as notification pursuant to Section 22a-449(c)-105(h) and Section 22a-133k-1 et seq. of the Regulations of Connecticut State Agencies that United Technologies Corporation, Pratt & Whitney Division (UTC) intends to undertake actions to remediate soil and groundwater contamination at its facility located at Aircraft Road in Middletown, Connecticut. The remedial action plan was developed based on assessment of the environmental conditions at the facility. The assessment identified areas of soil and groundwater beneath the Site that are contaminated with one or more of the following types of substances: volatile organic compounds, semi-volatile organic compounds, petroleum hydrocarbons, polychlorinated biphenyls, and metals. The actions that are proposed to be taken to remediate the identified contamination include excavation, off-site disposal of contaminated soil, consolidation of contaminated soil under an engineered control, soil vapor extraction or mitigation of volatile organic compounds, and recording of environmental land use restrictions. While most of the groundwater on the Site does not require remediation, one area of volatile organic contamination in groundwater will undergo monitored natural attenuation. The engineered controls that are proposed for the site will encapsulate contaminated soil beneath one of three types of caps: a low permeability soil cap, an asphalt cap, or a cap constructed with a low permeability plastic liner. The remedial actions will begin in 2014 and will be completed by 2018.

Should you have any questions or comments concerning this information, please do not hesitate to contact me at (860) 410-3028.

Sincerely,
LOUREIRO ENGINEERING ASSOCIATES, INC.

David Fiereck, P.E., L.E.P.
Vice President

Table

Table 1

COMPARISON OF SOXHLET EXTRACTION AND MICROWAVE EXTRACTION PCB ANALYTICAL RESULTS
FORMER BUILDING 270 - JULY 2016 SAMPLING EVENT
Pratt & Whitney Facility, Middletown, Connecticut

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	Location ID	B220-SB-528	B220-SB-528	B220-SB-529	B220-SB-529	B220-SB-533	B220-SB-533	B220-SB-533	
	Sample ID	1359669	1359669	1359675	1359675	1359687	1359687	1359689	
	Sample Date	7/1/2016	7/1/2016	7/1/2016	7/1/2016	7/12/2016	7/12/2016	7/12/2016	
	Sample Time	14:30	14:30	14:40	14:40	9:35	9:35	9:35	
	Sample Depth	0' - 2'	0' - 2'	0' - 2'	0' - 2'	0' - 2'	0' - 2'	0' - 2'	
	Sample Type	Soil	Soil	Soil	Soil	Soil	Soil	Soil	
	Laboratory	ACTM	ACTM	ACTM	ACTM	ACTM	ACTM	ACTM	
	Lab. Number	MC46720-49	MC46720-49T	MC46720-52	MC46720-52T	MC46819-1	MC46819-1R	MC46819-2	
Constituent	Units								
Date PCBs Analyzed	-	7/6/2016	7/12/2016	7/7/2016	7/12/2016	7/15/2016	7/20/2016	7/15/2016	
Extraction Method	-	3540C	3546	3540C	3546	3540C	3546	3540C	
Arochlor 1232	mg/kg								
Arochlor 1242	mg/kg								
Arochlor 1248	mg/kg								
Arochlor 1254	mg/kg	0.17	0.156	1.88	2.8	1.33	0.78	0.824	
Arochlor 1260	mg/kg								
Total PCBs	mg/kg	0.17	0.156	1.88	2.8	1.33	0.78	0.824	

	Location ID	B220-SB-534	B220-SB-534	B220-SB-534	B220-SB-534	B220-SB-535	B220-SB-535	B220-SB-535	B220-SB-535
	Sample ID	1359664	1359664	1359664	1359664	1359651	1359651	1359652	1359652
	Sample Date	7/1/2016	7/1/2016	7/1/2016	7/1/2016	7/1/2016	7/1/2016	7/1/2016	7/1/2016
	Sample Time	14:00	14:00	14:00	14:00	12:55	12:55	12:55	12:55
	Sample Depth	8' - 10'	8' - 10'	8' - 10'	8' - 10'	0' - 2'	0' - 2'	0' - 2'	0' - 2'
	Sample Type	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Laboratory	ACTM	ACTM	ACTM	ACTM	ACTM	ACTM	ACTM	ACTM
	Lab. Number	MC46720-44	MC46720-44T	MC46720-44VA	MC46720-44V	MC46720-31	MC46720-31T	MC46720-32	MC46720-32T
Constituent	Units								
Date PCBs Analyzed	-	7/6/2016	7/12/2016	7/19/2016	7/20/2016	7/7/2016	7/12/2016	7/5/2016	7/12/2016
Extraction Method	-	3540C	3546	3540C	3546	3540C	3546	3540C	3546
Arochlor 1232	mg/kg								
Arochlor 1242	mg/kg								
Arochlor 1248	mg/kg								
Arochlor 1254	mg/kg	42.9	0.413	0.177	0.244	0.816	0.477	0.588	0.453
Arochlor 1260	mg/kg								
Total PCBs	mg/kg	42.9	0.413	0.177	0.244	0.816	0.477	0.588	0.453

Table 1

COMPARISON OF SOXHLET EXTRACTION AND MICROWAVE EXTRACTION PCB ANALYTICAL RESULTS
FORMER BUILDING 270 - JULY 2016 SAMPLING EVENT
Pratt & Whitney Facility, Middletown, Connecticut

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	Location ID	B220-SB-535	B220-SB-535	B220-SB-535	B220-SB-535	B220-SB-536	B220-SB-536		
	Sample ID	1359657	1359657	1359658	1359658	1359635	1359635		
	Sample Date	7/1/2016	7/1/2016	7/1/2016	7/1/2016	7/1/2016	7/1/2016		
	Sample Time	13:15	13:15	13:18	13:18	11:10	11:10		
	Sample Depth	10' - 12'	10' - 12'	12' - 16'	12' - 16'	8' - 10'	8' - 10'		
	Sample Type	Soil	Soil	Soil	Soil	Soil	Soil		
	Laboratory	ACTM	ACTM	ACTM	ACTM	ACTM	ACTM		
	Lab. Number	MC46720-37	MC46720-37T	MC46720-38	MC46720-38T	MC46720-15	MC46720-15T		
Constituent	Units								
Date PCBs Analyzed	-	7/5/2016	7/12/2016	7/6/2016	7/12/2016	7/7/2016	7/12/2016		
Extraction Method	-	3540C	3546	3540C	3546	3540C	3546		
Arochlor 1232	mg/kg								
Arochlor 1242	mg/kg								
Arochlor 1248	mg/kg					0.0778	0.0734		
Arochlor 1254	mg/kg	0.237	0.195	0.903	1.21	0.0812	0.0628		
Arochlor 1260	mg/kg								
Total PCBs	mg/kg	0.237	0.195	0.903	1.21	0.159	0.1362		

	Location ID	B220-SB-536	B220-SB-536	B220-SB-536	B220-SB-536				
	Sample ID	1359641	1359641	1359641	1359641				
	Sample Date	7/1/2016	7/1/2016	7/1/2016	7/1/2016				
	Sample Time	11:30	11:30	11:30	11:30				
	Sample Depth	20' - 22'	20' - 22'	20' - 22'	20' - 22'				
	Sample Type	Soil	Soil	Soil	Soil				
	Laboratory	ACTM	ACTM	ACTM	ACTM				
	Lab. Number	MC46720-21	MC46720-21T	MC46720-21VA	MC46720-21V				
Constituent	Units								
Date PCBs Analyzed	-	7/7/2016	7/12/2016	7/19/2016	7/20/2016				
Extraction Method	-	3540C	3546	3540C	3546				
Arochlor 1232	mg/kg								
Arochlor 1242	mg/kg	4.21	0.361	0.329	0.266				
Arochlor 1248	mg/kg	3.99							
Arochlor 1254	mg/kg		0.211	0.156	0.191				
Arochlor 1260	mg/kg		0.0522	0.0528	0.0504				
Total PCBs	mg/kg	8.2	0.6242	0.5378	0.5074				